

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Anat Madar  
2010 Terwood Road, Huntingdon Valley, PA 19006

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Andrew L. Miller, Esquire  
15 St. Asaph's Road, Bala Cynwyd, PA 19004

**DEFENDANTS**

City of Philadelphia  
One Parkway Building, 14th Floor

County of Residence of First Listed Defendant Philadelphia  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Jonathan Cooper, Esquire  
1515 Arch Street, 14th Floor, Philadelphia, PA 19102

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                        |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutional of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Recopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C., Section 1983

Brief description of cause:  
Equal Rights Protection

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE 12/18/19 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**DESIGNATION FORM**

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: Anat Madar, 2010 Terwood Road, Huntingdon Valley, PA 19006

Address of Defendant: City of Philadelphia Law Department, 1515 Arch Street, 14th Floor, Philadelphia, PA

Place of Accident, Incident or Transaction: Philadelphia, PA

**RELATED CASE, IF ANY:**

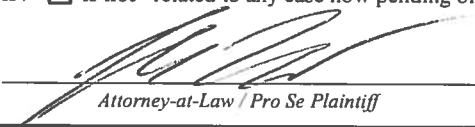
Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when *Yes* is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or growout of the same transaction as a prior suit pending or within one year previously terminated action in this court?             | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 12/20/2019

  
Attorney-at-Law / Pro Se Plaintiff

316374

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☒ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases  
(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases  
(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, \_\_\_\_\_, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_

Attorney-at-Law / Pro Se Plaintiff

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

Anat Madar	:	COURT OF COMMON PLEAS
2010 Terwood Road	:	
Huntingdon Valley, PA 19006	:	PHILADELPHIA COUNTY
	:	
vs.	:	
	:	
City of Philadelphia	:	
c/o City of Philadelphia Law Department	:	November Term 2019
1515 Arch Street, 17 <sup>th</sup> Floor	:	No.: 003525
Philadelphia, PA 19102	:	
and	:	
Honorable James Kenney	:	
Mayor of the City of Philadelphia	:	
Room 215, City Hall	:	
1501 Market Street	:	
Philadelphia, PA 19107	:	
and	:	
David Perri	:	
Commissioner of the Department of	:	
Licenses and Inspections	:	
1401 John F. Kennedy Boulevard	:	
11 <sup>th</sup> Floor	:	
Philadelphia, PA 19102	:	

## CASE MANAGEMENT TRACK DESIGNATION FORM

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus -- Cases brought under 28 U.S.C. §2241 through § 2255. ( )
- (b) Social Security -- Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration -- Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos -- Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management -- Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )

(f) Standard Management -- Cases that do not fall into any one of the other tracks.

( X )

Date 12/18/19

  
Jonathan Cooper, Esq.

Defendants

Attorney for

(215) 683-5448

(215) 683-5397

Jonathan.Cooper@phila.gov

Telephone

FAX Number

E-mail Address

(Civ. 660) 10/02

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

and

Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107

and

David Perri  
Commissioner of the Department of  
Licenses and Inspections  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

November Term 2019

No.: 003525

**NOTICE OF REMOVAL**

**To the Honorable Judges of the United States District Court for the Eastern District of Pennsylvania.**

Pursuant to 28 U.S.C. § 1441, City of Philadelphia, Honorable James Kenney, David Perri, Commissioner of the Department of Licenses and Inspections (hereinafter “petitioners”) through their counsel, Jonathan Cooper, Deputy City Solicitor, respectfully petition for the removal of this action to the United States District Court for the Eastern District of Pennsylvania. In support thereof, defendants state the following:

1. In November 2019, plaintiff initiated this action by a Complaint in the Court of Common Pleas, November Term, 2019; No. 003525. (Exhibit A - Complaint).

2. On December 4, 2019 said Complaint was served on Petitioners at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

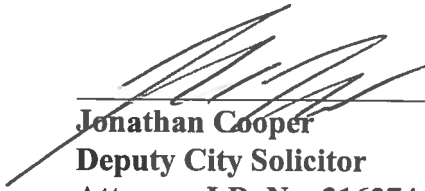
3. Plaintiff alleges that on an unspecified date in 2019 he sustained damages when his civil rights were violated by the defendants. (Exhibit A ).

4. This action may be removed to this Court pursuant to 42 U.S.C. § 1983 since Plaintiff's Complaint contains allegations of violations of the plaintiff's Federal Civil Rights and seeks relief under 42 U.S.C. § 1983. (Exhibit A)

**Wherefore,** petitioners, City of Philadelphia, Honorable James Kenney, David Perri, Commissioner of the Department of Licenses and Inspections respectfully request that the captioned Complaint be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

Jonathan Cooper  
Deputy City Solicitor



**Jonathan Cooper**  
**Deputy City Solicitor**  
**Attorney I.D. No. 316374**  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
215-683-5448

Date: 12/18/19

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

and

Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107

and

David Perri  
Commissioner of the Department of  
Licenses and Inspections  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

November Term 2019

No.: 003525

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**NOTICE OF FILING OF REMOVAL**

TO: Andrew L. Miller, Esquire  
15 St. Asaph's Rd.  
Bala Cynwyd, PA 19004

PLEASE TAKE NOTICE THAT on December 20, **2019** defendants, City of Philadelphia, Honorable James Kenney, David Perri, Commissioner of the Department of Licenses and Inspections filed, in the office of the Clerk of the United States District Court for the Eastern District of Pennsylvania a verified Notice of Removal.

A copy of this Notice of Removal is attached hereto and is also being filed with the Clerk of the Court of Common Pleas of Philadelphia County, pursuant to Title 28, United States Code, Section 1441.



**Jonathan Cooper**

**Deputy City Solicitor**

**Attorney I.D. No. 316374**

1515 Arch Street, 14<sup>th</sup> Floor

Philadelphia, PA 19102

215-683-5448



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

<b>Anat Madar</b>	:	<b>COURT OF COMMON PLEAS</b>
<b>2010 Terwood Road</b>	:	
<b>Huntingdon Valley, PA 19006</b>	:	<b>PHILADELPHIA COUNTY</b>
	:	
<b>vs.</b>	:	
	:	
<b>City of Philadelphia</b>	:	
<b>c/o City of Philadelphia Law Department</b>	:	<b>November Term 2019</b>
<b>1515 Arch Street, 17<sup>th</sup> Floor</b>	:	<b>No.: 003525</b>
<b>Philadelphia, PA 19102</b>	:	
<b>and</b>	:	
<b>Honorable James Kenney</b>	:	
<b>Mayor of the City of Philadelphia</b>	:	
<b>Room 215, City Hall</b>	:	
<b>1501 Market Street</b>	:	
<b>Philadelphia, PA 19107</b>	:	
<b>and</b>	:	
<b>David Perri</b>	:	
<b>Commissioner of the Department of</b>	:	
<b>Licenses and Inspections</b>	:	
<b>1401 John F. Kennedy Boulevard</b>	:	
<b>11<sup>th</sup> Floor</b>	:	
<b>Philadelphia, PA 19102</b>	:	

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**NOTICE OF FILING OF NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1441, Defendants, City of Philadelphia, Honorable James Kenney, David Perri, Commissioner of the Department of Licenses and Inspections (collectively, the “Removing Defendants”), by and through undersigned counsel, hereby give notice that they have filed in the United States District court for the Eastern District of Pennsylvania the attached Notice of Removal (without exhibits) of the above-captioned action.

Pursuant to 42 U.S.C. § 1441, the filing of this Notice effects the removal of this action to the federal court, and this Court is directed to “proceed no further unless and until the case is remanded.” 42 U.S.C. § 1441.

Respectfully submitted,

Date:



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Jonathan Cooper, Esquire  
Deputy City Solicitor

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

and

Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107

and

David Perri  
Commissioner of the Department of  
Licenses and Inspections  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

November Term 2019

No.: 003525

:

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**CERTIFICATE OF SERVICE**

I, Jonathan Cooper, Deputy City Solicitor, do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the following by First Class Mail, postpaid, on the date indicated below:

TO: Andrew L. Miller, Esquire  
15 St. Asaph's Road  
Bala Cynwyd, PA 19004

Date: \_\_\_\_\_

12/18/19

  
Jonathan Cooper  
Deputy City Solicitor  
Attorney I.D. No. 316374  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
215-683-5448

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

and

Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107

and

David Perri  
Commissioner of the Department of  
Licenses and Inspections  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

November Term 2019

No.: 003525

---

**CERTIFICATE OF SERVICE**

I, Jonathan Cooper, Deputy City Solicitor, do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the following by First Class Mail, postpaid, on the date indicated below:

TO: Piayon Lassanah, Esquire  
1333 Chestnut Street  
Philadelphia, PA 19147

Date:

12/18/19

  
Jonathan Cooper

Deputy City Solicitor

Attorney I.D. No. 316374

1515 Arch Street, 14<sup>th</sup> Floor

Philadelphia, PA 19102

215-683-5448

## Exhibit “A”

# Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

**NOVEMBER 2019**

**003525**

E-Filing Number: 1911059671

PLAINTIFF'S NAME  
ANAT MADAR

DEFENDANT'S NAME  
CITY OF PHILADELPHIA

PLAINTIFF'S ADDRESS  
2010 TERWOOD ROAD  
HUNTINGDON VALLEY PA 19006

DEFENDANT'S ADDRESS  
C/O LAW DEPARTMENT 1515 ARCH STREET, 17TH FLOOR  
PHILADELPHIA PA 19102

PLAINTIFF'S NAME

DEFENDANT'S NAME  
JAMES KENNEY

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS  
1501 MARKET STREET, ROOM 215 CITY HALL  
PHILADELPHIA PA 19107

PLAINTIFF'S NAME

DEFENDANT'S NAME  
DAVID PERRI

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS  
1401 JFK BOULEVARD 11TH FLOOR  
PHILADELPHIA PA 19102

TOTAL NUMBER OF PLAINTIFFS

1

TOTAL NUMBER OF DEFENDANTS

3

COMMENCEMENT OF ACTION

☒ Complaint

☐ Petition Action

☐ Notice of Appeal

☐ Writ of Summons

☐ Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less

☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration

☒ Jury

☐ Non-Jury

☐ Other:

☐ Mass Tort

☐ Savings Action

☐ Petition

☐ Commerce

☐ Minor Court Appeal

☐ Statutory Appeals

☐ Settlement

☐ Minors

☐ W/D/Survival

CASE TYPE AND CODE

30 - REAL PROPERTY - OTHER

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED  
PROTHONOTARY**

**NOV 26 2019**

**A. SILIGRINI**

IS CASE SUBJECT TO  
COORDINATION ORDER?

YES

NO

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: ANAT MADAR

Papers may be served at the address set forth below.

NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY

ANDREW L. MILLER

ADDRESS

15 ST. ASAPH'S RD  
BALA CYNWYD PA 19004

PHONE NUMBER

(610) 617-1776

FAX NUMBER

(610) 664-9435

SUPREME COURT IDENTIFICATION NO.

55994

E-MAIL ADDRESS

amiller@amillerlaw.com

SIGNATURE OF FILING ATTORNEY OR PARTY

ANDREW MILLER

DATE SUBMITTED

Tuesday, November 26, 2019, 01:54 pm

Andrew L. Miller & Associates, P.C.  
By: Andrew L. Miller, Esquire  
Attorney I.D. #55994  
15 St. Asaph's Road  
Bala Cynwyd, PA 19004  
(610) 617-1776

MAJOR JURY MATTERS

ASSESSMENT OF DAMAGES  
HEARING REQUIRED

Filed and Accepted by the  
Office of Judicial Records  
26 NOV 2019 01:54 pm  
SALISBURY  
COUNTY OF DELAWARE

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department:  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102  
and  
Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107  
and  
David Perri  
Commissioner of the Department of  
Licenses and Inspections  
City of Philadelphia  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Philadelphia Bar Association  
Lawyer Referral and Information Center  
One Reading Center  
Philadelphia, PA 19107  
Telephone 215-238-6333/ TTY 215-451-6197**

**NOTICIA**

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) dias a partir de recibir esta demanda y notificacion para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.

**Philadelphia Bar Association  
Lawyer Referral and Information Center  
One Reading Center  
Philadelphia, PA 19107  
Telephone 215-238-6333/ TTY 215-451-6197**



Andrew L. Miller & Associates, P.C.  
By: Andrew L. Miller, Esquire  
Attorney I.D. #55994  
15 St. Asaph's Road  
Bala Cynwyd, PA 19004  
(610) 617-1776

MAJOR JURY MATTER

ASSESSMENT OF DAMAGES  
HEARING REQUIRED

Anat Madar  
2010 Terwood Road  
Huntingdon Valley, PA 19006

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

vs.

City of Philadelphia  
c/o City of Philadelphia Law Department:  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

and

Honorable James Kenney  
Mayor of the City of Philadelphia  
Room 215, City Hall  
1501 Market Street  
Philadelphia, PA 19107

and

David Perri  
Commissioner of the Department of  
Licenses and Inspections  
City of Philadelphia  
1401 John F. Kennedy Boulevard  
11<sup>th</sup> Floor  
Philadelphia, PA 19102

**COMPLAINT**

Plaintiff Anat Madar, by and through her attorney, Andrew L. Miller, Esquire,  
brings this action against Defendants City of Philadelphia, Honorable James Kenney,  
Mayor of the City of Philadelphia, and David Perri, as Commissioner of the Department

of Licenses and Inspections of the City of Philadelphia and, in support thereof, states the following:

1. Plaintiff Anat Madar is an adult individual with an address at 2010 Terwood Road, Huntingdon Valley, PA 19006.
2. Defendant City of Philadelphia is a city of the first class under the laws of the Commonwealth of Pennsylvania with an address c/o City of Philadelphia Law Department, 1515 Arch Street, 17<sup>th</sup> Floor, Philadelphia, PA 19102.
3. Defendant Honorable James Kenney is the Mayor of the City of Philadelphia and is named as a defendant only in his official capacity and not personally. His address is Room 215, City Hall, 1501 Market Street, Philadelphia, PA 19107. As Mayor, Mr. Kenney is responsible for the general direction and oversight of the departments and agencies of the City of Philadelphia, including the Department of Licenses and Inspections.
4. Defendant David Perri is the Commissioner of the Department of Licenses and Inspections of the City of Philadelphia ("L&I") and is named as a defendant only in his official capacity. His address is 1401 John F. Kennedy Boulevard, 11<sup>th</sup> Floor, Philadelphia, PA 19102. As director, Mr. Perri is responsible for the direction and oversight of L&I and its employees, agents and contractors.
5. At all times relevant hereto, Defendants acted under color of law in their capacity as state actors.
6. At all times relevant hereto, Plaintiff was and is the owner of certain real property located in the city and county of Philadelphia with an address of 5025 Reno

Street (the "Property"). Plaintiff obtained title to the Property by deed from the Sheriff of Philadelphia County dated April 23, 2019 and recorded in the Philadelphia Department of Records on May 3, 2019, at Document I.D. No. 53507626. A true and correct copy of Plaintiff's deed is attached hereto as Exhibit "A".

7. The Property was sold at the suit of the City of Philadelphia to collect unpaid taxes.

8. When Plaintiff purchased the Property at Sheriff's Sale held on March 12, 2019, it was improved with a single-family dwelling house. The house was in structurally sound condition.

9. Plaintiff is in the business of purchasing and renovating properties and she purchased the Property with the intent of renovating the dwelling house and leasing or selling the improved Property, for profit.

10. After purchasing the Property, Plaintiff took possession of and secured the dwelling house.

11. Shortly after Plaintiff purchased and took possession of the Property, the exact date of which is not currently known, Defendant City of Philadelphia, acting by and through its agents, servants, employees or contractors, within the course and scope of their employment, agency or duties, without any notice or warning to Plaintiff, without justification or cause, and without Plaintiff's permission, demolished the dwelling house located on the Property.

12. Based on knowledge, information and belief, Plaintiff avers that the person or persons who demolished the dwelling house were employees, agents or contractors of

L&I and were acting upon the direction and instruction of that department and its Commissioner, David Perri.

13. As a result of the wrongful demolition of the dwelling house, Plaintiff has suffered damages, including diminishment in the fair market value of the Property, loss of the use and benefits of the Property, additional carrying costs, additional costs to replace the house, and the loss of income and profits anticipated from the improved property.

14. By letter dated June 11, 2019, Plaintiff, through her counsel, gave Defendant City of Philadelphia notice of her claim. A true and correct copy of that letter is attached hereto as Exhibit "B".

**COUNT I**  
**TRESPASS**

15. Plaintiff incorporates the preceding averments of the Complaint as if set forth at length.

16. At all times relevant, Plaintiff was in possession and control of the Property and was its lawful owner.

17. The actions of the Defendants, by and through their agents, servants, employees or contractors, acting upon the direction of Defendants, in intentionally entering upon the Property and demolishing the dwelling house, were without authority, justification, privilege or right, and were in derogation of the rights of Plaintiff.

18. The actions of the Defendants, as aforesaid, constituted a trespass upon Plaintiff's Property.

19. As a result, Plaintiff has suffered damages as aforesaid.

WHEREFORE, Plaintiff Anat Madar requests that this Court enter judgment in her favor and against Defendants in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest, costs and attorney's fees as permitted by law, and grant such other and further relief as this Court deems just.

**COUNT II**  
**NEGLIGENCE**

20. Plaintiff incorporates by reference the preceding averments of this Complaint as it set forth at length.

21. Defendants were negligent and careless in the following:

- a. Ordering the demolition of the dwelling house where it was secure and posed no harm or threat of harm to individuals or the community;
- b. Failing to take reasonable steps to determine whether the dwelling house constituted a harm or threat of harm to individuals or the community before ordering its demolition;
- c. Failing to give notice to the Plaintiff, as owner of the Property, before entering onto the Property and demolishing the house;
- d. Failing to give notice to Plaintiff of Defendants' intention to demolish the house, despite the fact that Plaintiff's ownership of the Property and the address of Plaintiff is a matter of public record;
- e. Failing to post the Property with notice of Defendants' intention to demolish the Property;

f. Failing otherwise to take reasonable efforts to contact and give notice to Plaintiff of their intention to demolish the house, especially since Defendants knew or should have known that a new owner had recently purchased the Property;

g. Demolishing the house where the structure was sound, stable and secure and did not present any threat to the public health or safety;

h. Trespassing on the Property and demolishing the house without the consent of the Plaintiff;

i. Failing to warn Sheriff's sale bidders of an intention to demolish the structure;

j. Violating applicable laws, statutes and ordinances;

k. Failing to follow established procedures and protocols; and

l. Acting in an otherwise negligent and careless manner under the circumstances.

22. As a direct result of the negligence and carelessness of Defendants, Plaintiff has suffered damages as aforesaid.

WHEREFORE, Plaintiff Anat Madar requests that this Court enter judgment in her favor and against Defendants in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest, costs and attorney's fees as permitted by law, and grant such other and further relief as this Court deems just.



**COUNT III**  
**VIOLATION OF DUE PROCESS AND EQUAL PROTECTION OF LAW**

23. Plaintiff incorporates by reference the preceding averments of this Complaint as if set forth at length.

24. The actions of the Defendants in ordering, authorizing and demolishing the dwelling house, which was structurally sound and presented no danger to the public, without notice to Plaintiff, the property's owner, were arbitrary, capricious and contrary to law and violated Plaintiff's rights to due process and equal protection of law under the Pennsylvania Constitution and the United States Constitution.

25. The actions of Defendants in ordering, authorizing and demolishing the dwelling house without providing Plaintiff with notice and opportunity to contest the demolition were arbitrary, capricious and contrary to law and violated Plaintiff's rights to due process and equal protection of laws under the Pennsylvania Constitution and the United States Constitution.

26. The actions of Defendants as aforesaid have effected a taking of Plaintiff's property without just compensation in violation of rights guaranteed by the Pennsylvania and United States Constitutions.

27. As a result of Defendants' actions in violation of law, Plaintiff has suffered damages as aforesaid.

WHEREFORE, Plaintiff Anat Madar requests that this Court enter judgment in her favor and against Defendants in an amount in excess of Fifty Thousand (\$50,000.00)

Dollars, plus interest, costs and attorney's fees as permitted by law, and such other and further relief as this Court deems just.

**COUNT IV**  
**TAKING**

28. Plaintiff incorporates by reference the preceding averments of the Complaint as if set forth at length.

29. The actions of Defendants in ordering, authorizing and demolishing the dwelling house without notice or permission of Plaintiff, and without opportunity for prior hearing, constitute a *de facto* taking of Plaintiff's property for public use.

30. Pursuant to the United States Constitution, the Pennsylvania Constitution, especially Article I, Section 10 thereof, and the Pennsylvania Eminent Domain Code, 2006 May 4, P.L. 112, No. 23, as amended (26 Pa. C.S.A. § 101, et seq.), Plaintiff is entitled to just compensation for the property interests so taking together with such other compensation and damages as are provided by the Eminent Domain Code and applicable law.

WHEREFORE, Plaintiff Anat Madar requests that this Honorable Court determine that the actions of Defendants constitute a taking of Plaintiff's property and order that Defendants pay just compensation and award such other damages and compensation as are provided by the Pennsylvania Eminent Domain Code and by applicable law, and grant such other and further relief as this Court deems just.



**COUNT V**  
**ACTION PURSUANT TO 42 U.S.C. § 1983**

31. Plaintiff incorporates by reference the preceding averments of the Complaint as if set forth at length.

32. 42 U.S.C. § 1983 provides in pertinent part:

Every person who, under color of any statute, ordinance, regulation, custom or usage, of any state . . . subjects or causes to be subjected, any citizen of the United States . . . to the deprivation of any rights, privileges or immunities secured by the Constitution and law, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress . . .

33. Defendants City of Philadelphia, James Kenney and David Perri are “persons” within the meaning of 42 U.S.C. § 1983.


34. Plaintiff is a “citizen of the United States” within the meaning of 42 U.S.C. § 1983.

35. Defendants City of Philadelphia, James Kenney and David Perri are liable to Plaintiff for damages for depriving it of its rights secured by the Constitution and law, including but not limited to, its rights to due process and equal protection of laws and its right not to be deprived of property without due process of law.

WHEREFORE, Plaintiff Anat Madar requests that this Court enter judgment in its favor and against Defendants in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest and costs, and award her attorney’s fees, and grant such other and further relief as this Court deems just.

Andrew L. Miller & Associates, P.C.

By:

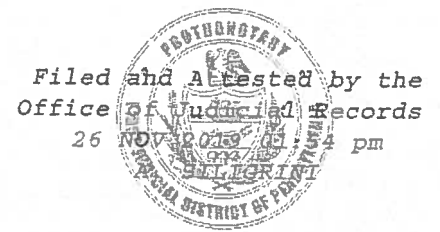
  
\_\_\_\_\_  
Andrew L. Miller, Esquire  
Attorney for Plaintiff Anat Madar

VERIFICATION

I, Anat Madar, say that the facts and information set forth in the within Complaint are true and correct to the best of my knowledge, information and belief and that this Verification is made in accordance with the provisions of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 11/20/19

  
\_\_\_\_\_  
Anat Madar



# EXHIBIT A

eRecorded in Philadelphia PA Doc Id: 53507626  
05/03/2019 12:05 PM Page 1 of 6 Rec Fee: \$256.75  
Receipt#: 19-42519  
Records Department Doc Code: DS  
State RTT: \$104.03 Local RTT: \$341.01

1902-4086

## **Know all Men by these Presents**

*THAT I, Jewell Williams, Sheriff of the County of Philadelphia in the Commonwealth of Pennsylvania, for and in consideration of the sum of TWELVE THOUSAND ONE HUNDRED AND XX / 100 [\$12,100.00] dollars, to me in hand paid, do hereby grant and convey to ANAT MADAR .*

### **DESCRIPTION**

BRT#: 441306700

Premises Being: 5025 RENO ST, PHILADELPHIA, PA 19139-1647

SEE ATTACHED LEGAL DESCRIPTION

*The same having been sold, on the 21st day of March Anno Domini Two Thousand Nineteen, after due advertisement, according to the law, under and by virtue of a Writ of Execution/DECREE issued out of the Court of Common Pleas as of July Term, Two Thousand Fourteen Number T0020 as the suit of:*

CITY OF PHILADELPHIA

VS.

NORMAN KENNETH JONES, SR. (A/K/A NORMAN JONES) AND DELORES JONES

In witness whereof, I have hereunto affixed my signature this 23rd day of April Anno Domini Two Thousand Nineteen.

SEALED AND DELIVERED  
IN THE PRESENCE OF:



Witness

Jewell Williams, SHERIFF

BY

Richard Tyor

Witness



Joseph C. Vignola, Undersheriff

Commonwealth of Pennsylvania :

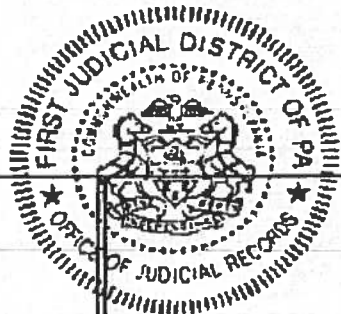
County of Philadelphia :

On this, the 23 Apr 2019, before me, the undersigned Officer, personally appeared JEWELL WILLIAMS, BY HIS/HER UNDERSHERIFF JOSEPH C. VIGNOLA, Sheriff of the County of Philadelphia, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he/she executed the same in the capacity therein stated and for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

*Steven J. Wulko*

Office of Judicial Records  
Steven J. Wulko, Deputy Director



Book No. 1902

Writ No. 4086

Control No.

## Deed = Poll

Jewell Williams, SHERIFF

TO

ANAT MADAR

CITY OF PHILADELPHIA

VS.

NORMAN KENNETH JONES, SR. (A/K/A NORMAN JONES) AND  
DELORES JONES

Jul. T. 2014

T0020

No.

Premises:

5025 RENO ST  
PHILADELPHIA, PA19139-1647

Sheriff of the County of Philadelphia  
Chief Inspector Richard Verrecchio

Witness

Real Estate/Settlement Dept.

Land Title Building

100 South Broad Street 5th Floor

Philadelphia, PA19110

The Address of the within-named Grantee

2010 TERWOOD RD

HUNTINGDON VY, PA19006

On behalf of the Grantee

Jewell Williams, SHERIFF

Philadelphia Sheriff Office



REV-183 EX (2-15)



**pennsylvania**  
DEPARTMENT OF REVENUE

Bureau of Individual Taxes  
PO BOX 280603  
Harrisburg, PA 17128-0603

53507626 Page 4 of 4  
**REALTY TRANSFER TAX  
STATEMENT OF VALUE**

See reverse for instructions.

**RECORDER'S USE ONLY**

State Tax Paid

Book Number

Page Number

Date Recorded

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

**A. CORRESPONDENT** - All inquiries may be directed to the following person:

Name <b>Sheriff of the County of Philadelphia</b>		Telephone Number <b>(215) 686-3530</b>	
Mailing Address <b>Land Title Building 100 South Broad Street 5th Floor</b>		City <b>Philadelphia</b>	State ZIP Code <b>PA 19110</b>

**B. TRANSFER DATA****Date of Acceptance of Document**

Grantor(s)/Lessor(s) <b>Jewell Williams, Sheriff</b>		Grantee(s)/Lessee(s) <b>ANAT MADAR</b>	
Mailing Address <b>Land Title Building 100 South Broad Street 5th Floor</b>		Mailing Address <b>2010 TERWOOD RD</b>	
City <b>Philadelphia</b>	State <b>PA</b>	ZIP Code <b>19110</b>	City <b>HUNTINGDON VY</b>
			State ZIP Code <b>PA 19006</b>

**C. REAL ESTATE LOCATION**

Street Address <b>5025 RENO ST</b>		City, Township, Borough <b>PHILADELPHIA</b>	
County <b>Philadelphia</b>	School District	Tax Parcel Number <b>441306700</b>	

**D. VALUATION DATA**Was transaction part of an assignment or relocation? ☐ Y ☐ N

1. Actual Cash Consideration <b>\$12,100.00</b>	2. Other Consideration <b>+ \$0.00</b>	3. Total Consideration <b>= \$12,100.00</b>
4. County Assessed Value <b>\$10,300.00</b>	5. Common Level Ratio Factor <b>x 1.01</b>	6. Computed Value <b>= \$10,403.00</b>

**E. EXEMPTION DATA** - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed	1b. Percentage of Grantor's Interest in Real Estate	1c. Percentage of Grantor's Interest Conveyed
---------------------------------	---	---

**2. Check Appropriate Box Below for Exemption Claimed.**

- ☐ Will or intestate succession. \_\_\_\_\_  
(Name of Descendant) (Estate File Number)
- ☐ Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- ☐ Transfer from a trust. Date of transfer into trust \_\_\_\_\_  
If trust was amended attach a copy of original and amended trust.
- ☐ Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- ☐ Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- ☐ Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- ☐ Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- ☐ Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- ☐ Other (Please explain exemption claimed.) \_\_\_\_\_

Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party  
**Stephanie Cruz**

Date  
**04/23/2019**

**FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.**

Case ID: 191103525



<b>PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION</b>		BOOK NO  PAGE NO  DATE RECORDED CITY TAX PAID
Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).		
<b>A. CORRESPONDENT - All inquiries may be directed to the following person:</b>		
NAME <b>Sheriff of the County of Philadelphia</b>		TELEPHONE NUMBER <b>(215) 686-3530</b>
STREET ADDRESS <b>Land Title Building 100 South Broad Street 5th Floor</b>		CITY <b>Philadelphia</b>
		STATE <b>PA</b>
		ZIP CODE <b>19110</b>
<b>B. TRANSFER DATA</b>		
GRANTOR(S)/LESSOR(S) <b>Jewell Williams, Sheriff</b>		DATE OF ACCEPTANCE OF DOCUMENT: <b>ANAT MADAR</b>
GRantee(S)/LESsee(S) <b>Land Title Building 100 South Broad Street 5th Floor</b>		STREET ADDRESS <b>2010 TERWOOD RD</b>
CITY <b>Philadelphia</b>		CITY <b>HUNTINGDON VY</b>
STATE <b>PA</b>		STATE <b>PA</b>
ZIP CODE <b>19110</b>		ZIP CODE <b>19006</b>
<b>C. PROPERTY LOCATION</b>		
STREET ADDRESS <b>5025 RENO ST</b>		CITY, TOWNSHIP, BOROUGH <b>PHILADELPHIA</b>
COUNTY <b>PHILADELPHIA</b>	SCHOOL DISTRICT	TAX PARCEL NUMBER <b>441306700</b>
<b>D. VALUATION DATA</b>		
1. ACTUAL CASH CONSIDERATION <b>\$12,100.00</b>	2. OTHER CONSIDERATION <b>+ \$0.00</b>	3. TOTAL CONSIDERATION <b>= \$12,100.00</b>
4. COUNTY ASSESSED VALUE <b>\$10,300.00</b>	5. COMMON LEVEL RATIO FACTOR <b>X 1.01</b>	6. FAIR MARKET VALUE <b>= \$10,403.00</b>
<b>E. EXEMPTION DATA</b>		
1A. AMOUNT OF EXEMPTION	1B. PERCENTAGE OF INTEREST CONVEYED	<b>Transfer Tax: \$445.04</b>
<b>2. Check Appropriate Box Below for Exemption Claimed</b>		
<input type="checkbox"/> Will or Intestate succession _____ <div style="text-align: center; font-size: small;">(NAME OF DECEDENT) (ESTATE FILE NUMBER)</div>		
<input type="checkbox"/> Transfer to Industrial Development Agency.		
<input type="checkbox"/> Transfer to agent or straw party. (Attach copy of agency/straw party agreement).		
<input type="checkbox"/> Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____.		
<input type="checkbox"/> Transfer to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).		
<input type="checkbox"/> Transfer from mortgagor to a holder of a mortgage in a default. Mortgage Book Number _____. Page Number _____. Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).		
<input type="checkbox"/> Corrective deed (Attach copy of the prior deed).		
<input type="checkbox"/> Other (Please explain exemption claimed, if other than listed above.) _____ _____ _____		
<i>Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.</i>		
SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY <b>Stephanie Cruz</b>		DATE <b>4/23/2019</b>

53507626 Page 6 of 6 05/03/2019 12:05 PM 1086

ATTACHED TO AND FORMING A PART OF TAX INFORMATION CERTIFICATE

Order Number: LTS1943187

Client Number: 441306700

**LEGAL DESCRIPTION:**

ALL THAT CERTAIN lot or piece of ground with the 2 story brick messuage or tenement thereon erected.

SITUATE on the North side of Reno Street at the distance of 169 feet 11 1/2 inches Westward from the West side of 50th Street in the 44th Ward of the City of Philadelphia.

CONTAINING in front or breadth on the said Reno Street 14 feet 1 inch and extending of that width in length or depth Northward between parallel lines at right angles with the said Reno Street 51 feet 6 inches to the middle of a certain 3 feet wide alley which extends Eastward and Westward from said 50th Street to 51st Street.

BEING NO. 5025 Reno Street.

TOGETHER with the free and common use, right, liberty and privilege of the said alley as and for a passageway and watercourse at all times hereafter, forever.

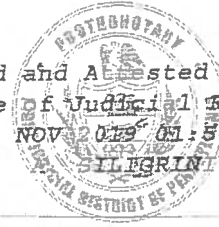
BEING the same premises which Mary Corcoran, Widow by Deed dated 7/23/1948 and recorded 7/26/1948 in Philadelphia County in Deed Book CJP 2096 page 425 conveyed unto Viola P. Baker Widow her heirs and assigns, in fee.

**FRONTAGE:** 14.08'x50'

Case ID: 1407T0020

Case ID: 191103525

Filed and Accepted by the  
Office of Judicial Records  
26 NOV 2019 01:54 pm



## EXHIBIT B

**LAW OFFICES  
ANDREW L. MILLER**

**&**

**ASSOCIATES**

**A PROFESSIONAL CORPORATION**

**15 ST. ASAPH'S ROAD**

**BALA CYNWYD, PENNSYLVANIA 19004-2405**

**ANDREW L. MILLER \***  
**DANIEL S. COVAL, JR.**

**(610) 617-1776**

**FAX (610) 664-9435**

**\*ADMITTED TO PRACTICE IN  
PENNSYLVANIA AND NEW JERSEY**

**E-MAIL: [AMILLER@AMILLERLAW.COM](mailto:AMILLER@AMILLERLAW.COM)**

June 11, 2019

Via Certified Mail, RRR  
and First Class Mail

City of Philadelphia  
Risk Management  
Tort Claims Notice  
1515 Arch Street  
14<sup>th</sup> Floor  
Philadelphia, PA 19102

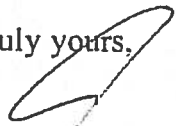
Re: My Client: Anat Madar  
Wrongful Demolition of 5025 Reno Street

Dear Sir or Madam:

Claim is hereby made against the City of Philadelphia for negligent demolition of the property at the above address. My client purchased the property at Sheriff's sale on March 12, 2019. The property was subsequently torn down by the City of Philadelphia without notice to my client and in violation of my client's constitutional rights. Demand is hereby made for compensation to my client for the value of the property. Please assign this matter to the appropriate adjuster and have them contact me immediately.

Thank you.

Very truly yours,



Andrew L. Miller, Esquire

ALM:lf

cc: Anat Madar

